

### **REMARKS**

Reconsideration of the above referenced application in view of the enclosed amendments and remarks is requested. Claims 1, 2, 4, 9, 10, 12, 17, 18, 23, 24, 35, and 36 have been amended. Claim 19 has been cancelled. Claims 1-18, and 20-37 remain in the application.

### **ARGUMENT**

Claims 1-7, 9-10, 13-15, 17-21, 23, 25, 29-31, and 34 are rejected under 35 USC 103(a) as being unpatentable over McDonough (US 6,714,982) in view of Namba (US 5,996,448).

The claims have been amended to more particularly recite the present invention. Independent claims 1, 9, and 17 have been amended to recite the limitations that the target entity is within a local area network (LAN), the LAN being coupled to another network and including a connection entity to interact with the trusted arbitrator over the other network in setting up the secure connection between the source entity and the target entity.

The Office action of May 19, 2005 applies the network (i.e., the Internet) of McDonough as teaching the claim limitation of a "connection entity". This is completely wrong. According to the Specification, a connection entity is a device that interacts with the trusted arbitrator regarding communication requests and secure connection requests sent by external entities (such as a source entity) to devices within a LAN. (see Specification at page 5, lines 17-20). The connection entity may reside on a device such as a router, on a dedicated computer, or on a computer that performs other tasks as well. In one embodiment, the connection entity and the access control mechanism may reside on the same device. (See Specification at page 5, lines 20-24). The connection entity of claims 1, 9, and 17 is NOT a network as taught by McDonough. Furthermore, Namba does not teach or suggest such a device.

Neither McDonough or Namba, either alone or in combination, teach or suggest all limitations of claims 1, 9, and 17. Specifically, there is no teaching of a connection entity as defined in the Specification, and no teaching or suggestion of the particular arrangement of claim elements and steps as claimed. The claims must be taken as a whole. A prima facie case of obviousness cannot be made for the present claims based on these prior art references.

Thus, claims 1, 9, and 17 are allowable as presented. Accordingly, all claims dependent from independent claims 1, 9, and 17 are also allowable (2-7, 9-10, 13-15, 17-21, 23, 25, 29-31, and 34).

Claims 3, 11, 22, and 24 are rejected under 35 USC 103(a) as being unpatentable over McDonough in view of Namba, and further in view of Wood (US 6,691,232).

These claims are allowable based on their dependency from their respective allowable independent claims.

Claims 8, 16, and 32 are rejected under 35 USC 103(a) as being unpatentable over McDonough in view of Namba, and further in view of Jaamies (US 6,138,037).

These claims are allowable based on their dependency from their respective allowable independent claims.

Claims 12 is rejected under 35 USC 103(a) as being unpatentable over McDonough in view of Namba, and further in view of Kung (US 5,434,918).

Claim 12 is allowable because it depends from allowable independent claim 9.

Claims 26-28, and 35-37 are rejected under 35 USC 103(a) as being unpatentable over McDonough in view of Namba, and further in view of McCurley, US patent application publication 2003/0167403).

Claims 26-28 are allowable because they depend from allowable independent claim 17.

As to independent claim 35, the claim as amended includes, in part, the limitations of a local area network (LAN) employing an encryption scheme, said LAN including a target entity, a connection entity coupled to the target entity, and an access control mechanism coupled to the connection entity. As discussed above, a connection entity as defined in the Specification is not a network, as asserted by the Examiner. The combination of McDonough, Namba, and McCurley does not properly teach or suggest a connection entity as claimed. Furthermore, the combination of references does not teach or suggest the particular arrangement of claim elements as recited. A prima facie case of obviousness has not been made. Therefore, claim 35, and all claims dependent therefrom (claims 36 and 37) are allowable.

### **CONCLUSION**

In view of the foregoing, Claims 1-18, and 20-37 are all in condition for allowance. If the Examiner has any questions, the Examiner is invited to contact the undersigned at (503) 264-8074. Early issuance of Notice of Allowance is respectfully requested.

Respectfully submitted,

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